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5 Attorneys for Defendant:  
6 **HPC BLACKSTONE INVESTORS, LP**

7 **UNITED STATES DISTRICT COURT**  
8 **EASTERN DISTRICT OF CALIFORNIA**

9 \* \* \*

10 GEORGE AVALOS, an individual )

NO. 1:20-cv-01385-DAD-SKO

11 )  
12 Plaintiff, )

13 vs. )

14 HPC BLACKSTONE INVESTORS, LP, )  
15 a California limited partnership; and )  
DOES 1-10, inclusive )

16 Defendants. )

**DEFENDANT, HPC BLACKSTONE  
INVESTORS LP'S, REQUEST FOR  
JUDICIAL NOTICE IN SUPPORT OF  
MOTION FOR PROTECTIVE  
ORDER TO STAY DISCOVERY  
WHILE MOTION TO DISMISS FOR  
LACK OF SUBJECT MATTER  
JURISDICTION (DOCUMENTS 20-36)  
IS PENDING**

17 ) Date: June 15, 2021

18 ) Time: 9:30 a.m.

19 ) Courtroom: 5, 7<sup>th</sup> Floor

20 ) Judge: Honorable Dale A. Drozd  
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1 Pursuant to Federal Rules of Evidence § 201(b)(2), Defendant respectfully requests that  
2 this Court take judicial notice of the following documents:

3 1. A true and accurate annotated copy of the Declaration of Michael Bluhm in  
4 Support of Motion to Dismiss for Lack of Subject Matter Jurisdiction, and all exhibits thereto,  
5 which were filed on May 13, 2021, are attached hereto as **Exhibit A**.

6 2. A true and accurate annotated copy of the Declaration of Rachelle Taylor Golden  
7 in Support of Motion to Dismiss for Lack of Subject Matter Jurisdiction, and all exhibits thereto,  
8 which were filed on May 13, 2021, are attached hereto as **Exhibit B**.

9 DATED: May 14, 2021

GOLDEN LAW A.P.C.

10 By /s/ Rachelle Taylor Golden  
11 RACHELLE TAYLOR GOLDEN  
12 Attorney for Defendant,  
13 HPC BLACKSTONE INVESTORS, LP  
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**PROOF OF SERVICE**

I am employed in the County of Fresno, California; I am over the age of eighteen years and not a party to the within cause; my business address is: 1100 W. Shaw Avenue, Suite 132, Fresno, CA 93711.

On May 14, 2021, I served the foregoing document(s) described as:

**DEFENDANT, HPC BLACKSTONE INVESTORS LP'S, REQUEST FOR JUDICIAL NOTICE IN SUPPORT OF MOTION FOR PROTECTIVE ORDER TO STAY DISCOVERY WHILE MOTION TO DISMISS FOR LACK OF SUBJECT MATTER JURISDICTION (DOCUMENTS 20-36) IS PENDING**

on all interested parties in this action by placing a true copy thereof enclosed in sealed envelopes addressed as follows:

MANNING LAW, APC  
Joseph R. Manning, Jr.  
20062 SW Birch Street, Ste. 200  
Newport Beach, CA 92660  
Ph: (949) 200-8755  
Email:  
[DisabilityRights@manninglawoffice.com](mailto:DisabilityRights@manninglawoffice.com)  
**Attorneys for Plaintiff, George Avalos**

\_\_\_\_ (BY FIRST CLASS MAIL) I am readily familiar with the business' practice for collection and processing of correspondence for mailing, and that correspondence, with postage thereon fully prepaid, will be deposited with the United States Postal Service on the date noted below in the ordinary course of business, at Fresno, California.

\_\_\_\_ (BY ELECTRONIC TRANSMISSION – by CM/ECF System) Notice of this filing will be sent by e-mail to all parties and the above-specified persons by operation of the Court's electronic filing CM/ECF system, which will send electronic notification of such filing to all counsel/parties.

**×** (BY ELECTRONIC TRANSMISSION) I caused the above-referenced document to be sent to the person(s) at the e-mail address(es) of the addressee(s) on the date stated thereon. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful. The electric notification address of the person making the service is [Rachelle@GoldenADADefense.com](mailto:Rachelle@GoldenADADefense.com)

**EXECUTED ON May 14, 2021, at Fresno, California.**

**×** (FEDERAL) I declare that I am employed in the office of a member of the State of this Court at whose direction the service was made. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

/s/ Rachelle Taylor Golden  
RACHELLE TAYLOR GOLDEN